

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

LS
5/2/95
144561

IN THE MATTER OF:

Sauget Area 1, Site G
Sauget, Illinois

Civil No. 95-30684-GBC

DECLARATION OF SAMUEL F. BORRIES

I, Samuel F. Borries, declare, under penalty of perjury, as follows:

1. I make this declaration in support of the attached Warrant which is sought pursuant to the authority of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §§ 9601-9675. I base this declaration upon discussions with other government personnel, personal knowledge and observation, and my review of government and other records.

2. I am an On-Scene Coordinator (OSC), employed by Region 5, United States Environmental Protection Agency (U.S. EPA) since October 10, 1992. My primary duties are to respond to emergency or exigent situations to protect human health and the environment from a release or threat of release of hazardous substances. Prior to being an OSC, I was a Remedial Project Manager for Region 5, U.S. EPA. My duties in this position, which I performed from August of 1990 to October of 1992, were to develop and implement long-term remedies at sites containing hazardous substances regulated by CERCLA.

3. I received a B.S. degree in Geology from Eastern Illinois University, Charleston, Illinois, in 1988.

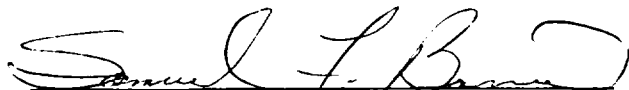
Ms. Emily Hankins.

15. Numerous attempts have been made by personnel of U.S. EPA to obtain Ms. Hankins' consent for access to the parcel of land she owns within Site G. Ms. Hankins owns parcel A-4 within Site G, as identified in Exhibit 3.

16. On March 27, 1995, I personally visited Ms. Hankins at her residence located on 3110 Mississippi Avenue in Sauget, Illinois, to attempt to obtain her consent for access to the parcel of land she owns within Site G to conduct the activities noted in paragraph 13, above. At that time, Ms. Hankins refused to give U.S. EPA consent to access to her property on Site G.

17. If U.S. EPA is not allowed expedited access to Site G to stabilize conditions, site conditions can be expected to deteriorate during wet weather events, increasing the threat of a release of hazardous substances that could endanger human health or the environment. Additionally, if stabilization measures are not taken before summer, the risk of fire at the site will again increase, also raising the threat of a release of hazardous substances that could endanger human health or the environment.

Executed: May 2, 1995.



Samuel F. Borries
On-Scene Coordinator
U.S. EPA, Region 5

Sworn to before me, and subscribed in my presence on the
2nd day of May, 1995, at East St. Louis, Illinois